

**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF OKLAHOMA**

**UNITED STATES OF AMERICA,**

*Plaintiff,*

**v.**

**LANDON JOE BLACK,**

*Defendant.*

**Case No. CR-23-183-JFH**

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**GOVERNMENT’S MOTION FOR CONTINUANCE**

Comes now the United States, by and through its attorneys, United States Attorney Christopher J. Wilson and Assistant United States Attorney Anthony C. Marek, and moves to continue the motion hearing regarding the Government’s opposed motion for protective order for approximately one week. In support, the United States would show the following:

1. As required by local rule, the undersigned attorney for the government requested Defendant’s position on this motion by email. Due to the brief window between the minute order setting the motion hearing and the date scheduled for the hearing itself, the government files this motion to provide as much notice as possible to the Court and to Defendant of a scheduling conflict. Accordingly, Defendant’s position on this motion is not known at the time of filing.

2. On or about October 12, 2023, the defendant was charged by indictment with two counts of production of child pornography, 18 U.S.C. § 2251(a) and (e), one count of advertisement of child pornography, 18 U.S.C. §§ 2251(d) and (e), and one count of possession of child pornography, 18 U.S.C. §§ 2252(a)(4)(B) and (b)(2).

3. The United States filed a motion for pretrial detention (Doc. 8), and Defendant requested a detention hearing, which was held on October 30, 2023 before United States

Magistrate Judge D. Edward Snow (Doc. 19). At the conclusion of the hearing, the magistrate judge ordered Defendant released with conditions. (Doc. 27.) The United States orally announced its intent to appeal the magistrate judge's release order, (Doc. 24), and filed a summary notice of appeal the same day (Doc. 23). Pursuant to the district court's order (Doc. 28), the United States filed a brief in support of its appeal on November 6, 2023 (Doc. 34). Defendant's brief is due on November 13, 2023. (Doc. 28.)

4. The United States filed an opposed motion for entry of protective order on November 1, 2023 (Doc. 29), and amended it on November 3, 2023 to attach the proposed order (Docs. 32, 32-1). Defendant filed a response on November 7, 2023. (Doc. 35.) This Court scheduled a hearing on the motion for protective order on November 9, 2023. (Doc. 36.)

5. The undersigned attorney for the government is traveling and will return to the office on November 16, 2023. The undersigned is scheduled to meet a witness in the Tulsa area the afternoon of November 16, 2023. Accordingly, should this motion be granted, the undersigned will be available:

- a. November 16, 2023 (morning)
- b. November 17, 2023 (all day)
- c. November 20 – 22, 2023 (all day)

6. The government does not request this brief continuance to unduly delay the proceedings or the government's discovery obligations. The United States has offered and will continue to offer the defense team the opportunity to review all categories of discovery, notwithstanding its pursuit of a protective order, at the United States Attorney's Office or the Federal Bureau of Investigation.

Wherefore, the United States respectfully requests that the Court continue the motion hearing for approximately one week to a date and time agreeable to the Court and the parties.

Respectfully submitted,

CHRISTOPHER J. WILSON  
United States Attorney

s/ Anthony C. Marek  
ANTHONY C. MAREK  
State Bar of Michigan #P76767  
Assistant United States Attorney  
520 Denison Ave.  
Muskogee, OK 74401  
(918) 684-5100  
Anthony.Marek@usdoj.gov

**CERTIFICATE OF SERVICE**

I hereby certify that on November 8, 2023, I electronically transmitted the attached documents to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrant:

Jarred Jennings  
Counsel for Defendant

s/ Anthony C. Marek  
ANTHONY C. MAREK  
Assistant United States Attorney